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Introduction

Montana's TANF program has been a huge success over the last decade.

In February 1996, Montana implemented its welfare reform program, Families Achieving Independence in Montana (FAIM). Operating under waivers, this program was highly successful in assisting participants in achieving self-sufficiency.

With the expiration of the waivers, the program evolved to meet the criteria established in the Personal Responsibility and Work Opportunities Reconciliation Act (PRWORA), while continuing to provide participants with meaningful services intended to assist them in achieving employment.

The TANF program in Montana involves two main players. Eligibility for the TANF program is established by Eligibility Case Managers in the Offices of Public Assistance (OPA). These offices are located in most counties throughout the State. The majority of case management services are provided by case managers employed by contracted agencies known as Work Readiness Component (WoRC) offices.

Both Eligibility Case Managers and WoRC Case Managers have supervisors in the offices responsible for ensuring policy is followed. As well, there are three WoRC Monitors located at the State level that perform additional oversight functions for the WoRC contracts throughout the State. These WoRC Monitors also are responsible for ensuring the WoRC policy guidelines, used by WoRC Offices throughout the State, are followed.

Through the eligibility determination process, Eligibility Case Managers determine which members of the household are work-eligible individuals or required to participate in employment and training activities based on State law. These individuals negotiate a Family Investment Agreement (FIA) with the Eligibility Case Manager and are then referred to either the Tribal NEW program or the WoRC office for case management services.

WoRC Offices are responsible for total case management including addressing employment barriers or making referrals to appropriate agencies to deal with these barriers. Individuals who are referred to WoRC for case management services must negotiate an Employability Plan (EP) with the WoRC Case Manager. This negotiation involves identifying which of the allowable work activities the participant will be involved in and the amount of hours they anticipate being involved in each specific work activity throughout the month.

Using an automated system titled *The Economic Assistance and Management System* or TEAMS, Eligibility Case Managers in the OPA determine eligibility for the TANF program. This system is also used by the WoRC Case Managers for case management

purposes as well as to monitor compliance with the work activities agreed to by each participant. Prior to issuance of TANF benefits, work-eligible participants and other individuals required to participate in employment and training activities by state law must **negotiate** hours of work activities through the FIA/EP, with the WoRC Case Manager.

Throughout the month, WoRC Case Managers maintain weekly contact with the participant in an effort to ensure their continued participation and compliance with the work activities. If necessary, the work activities are re-negotiated with the participant throughout the month. At the end of the month, a reconciliation process is completed on TEAMS, which allows the WoRC Case Manager to reconcile the actual hours of work activities completed by the participant during the month. These reconciled hours reflect actual verified, documented activities.

The FIA/EP is recorded in TEAMS and includes the work activities listed as component codes. Component notes allow WoRC Case Managers to enter specific information regarding the work activities. A printed copy of the FIA/EP is signed by the OPA Case Manager, the TANF participant and the WoRC Case Manager and maintained in the case file as well as on TEAMS. In Section 1, which outlines the work activities, the TEAMS component code for each work activity is listed.

As well as being the eligibility and case management system, the TEAMS system is the source for the TANF Data File that is processed and submitted to ACF on a quarterly basis. The TANF Data File contains information on reconciled (actual) hours of activities, in order to report on the actual hours of work activities, per participant. The TEAMS system also contains the demographic information and case level information necessary to determine the type of household, etc. for the TANF Data File. A description and information on the system processing of the TANF Data File is contained in Section 5 and Section 6.

In June of 2006, Montana was asked to participate in a single state audit with the assistance of the State's Legislative Audit Division. This audit was completed as part of the initial response to the TANF Improper Payments Act of 2002 (IPIA). The audit concluded that Montana demonstrates a significantly low error rate in its TANF program, indicating that not only benefits have been issued accurately but also that verification and documentation needed for eligibility determination and work participation was present.

Section 1

Countable Work Activities

**For purposes of this Section, countable hours will mean negotiated hours. Actual hours of participation, once verified and documented will refer to reconciled hours that are reported in the TANF File.
(See introduction for more information)**

Unsubsidized Employment
TEAMS Component Code: EMP
Primary Component

1. *Describe the services or programs the State includes under the activity.*

Services or programs that will be included under the Unsubsidized Employment activity include:

- Full or part-time paid employment in the public or private sector that is not subsidized by TANF funds or any other public program
- Self-employment (See #5 below)

2. *Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

The number of countable (negotiated) hours for this activity will be based on hours of employment using employer's statement, a work schedule, pay stubs or verification already existing on TEAMS or in the case file that is used to prospect income for eligibility purposes.

If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

Montana intends to project forward countable (negotiated) hours of participation for individuals in the TANF Post-Employment Program. The projection (up to three months) will be based on a signed employer's statement that includes information on the anticipated hours of employment, the rate of pay, and the start date of employment.

For self-employment, see #5 below.

3. *Describe how the State verifies the actual hours of participation for this activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

Actual hours of participation will be verified via:

- Pay stubs
- Employer wage or payroll records showing actual hours worked
- Timesheets
- Signed statements from employers attesting to the actual hours worked

The TANF participant will have the responsibility to obtain and provide this verification. If necessary, the WoRC Case Manager will assist the participant in obtaining the verification, provided a signed release of information form is present in the case file. These documents serve as documentation and verification of the actual hours worked. Hard copies of the verification will be maintained in the case file and a TEAMS case note will be entered indicating the type of verification that was received and when, as well as the allowable number of hours that were reconciled and reported in the TANF File based on this verification. The number of actual (reconciled) hours will include hours for which the individual is paid, but does not work, including paid leave and paid holidays.

For self-employment see #5 below.

4. *Describe the methods of daily supervision for each paid work activity.*

Daily supervision will be provided by the employer in a public or private employment situation.

For self-employment, see #5 below.

5. *Plan Documentation Specific to Self-employment.*

For self-employment describe how the State counts and verifies the hours of participation.

For self-employment, countable hours will be determined by using a calculation of gross earnings less business expenses divided by Federal minimum wage. Report of gross earnings and business expenses will be based on verification already existing on TEAMS or in the case file that is used to prospect income for eligibility purposes.

If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

Montana does not intend to project forward hours of participation in self-employment based on current, documented, actual hours but may at a later date. At that time the Work Verification Plan would be amended.

Subsidized private or public sector Employment
TEAMS Component Code: EMP
Primary Component

1. *Describe the services or programs the State includes under the activity.*

Services or programs that will be included under the Subsidized Private or Public Sector Employment activity include:

- Full or part-time paid employment in the private or public sector that is subsidized by TANF funds or any other public program. We are defining subsidy as a payment used to offset some or all of the wages and costs of employing a TANF participant.

Specific programs include the following:

- WIA paid work experience
- Vocational Rehabilitation programs, if subsidized paid employment is involved
- Work-study paid employment subsidized through an educational institution

2. *Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

The number of countable (negotiated) hours for this activity will be based on hours of employment using employer's statement, pay stubs, work schedule, or verification already existing on TEAMS or in the case file that is used to prospect income for eligibility purposes. The number of actual (reconciled) hours will include hours for which the individual is paid, but does not work, including paid leave and paid holidays.

The number of countable (negotiated) hours for assessment activities will be based upon a discussion and negotiation between the TANF participant and the WoRC Case Manager. Assessment hours will be negotiated and reconciled under the EMP component code.

3. *Describe how the State verifies the actual hours of participation for this activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

Actual hours of participation will be verified via:

- Pay stubs
- Employer wage or payroll records showing actual hours worked
- Timesheets
- Signed statements from employers attesting to the actual hours worked

The TANF participant will have the responsibility to obtain and provide this verification. If necessary, the WoRC Case Manager will assist the participant in obtaining the verification, provided a signed release of information form is present in the case file. These documents serve as documentation and verification of the actual hours worked. Hard copies of the verification will be maintained in the case file and a TEAMS case note will be entered indicating the type of verification that was received and when, as well as the allowable number of hours that were reconciled and reported in the TANF File based on this verification. The number of actual (reconciled) hours will include hours for which the individual is paid, but does not work, including paid leave and paid holidays.

4. *Describe the methods of daily supervision for each paid work activity.*

Daily supervision will be provided by the employer in a public or private employment situation.

5. *Plan Documentation Specific to Subsidized Private or Public Sector Employment.*

If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

Montana intends to project forward countable (negotiated) hours of participation for individuals in the TANF Post-Employment Program. The projection (up to three months) will be based on a signed employer's statement that includes information on the anticipated hours of employment, the rate of pay, and the start date of employment.

Work Experience

TEAMS Component Code: WEX

Primary Component

1. *Describe the services or programs the State includes under the activity.*

Services or programs that will be included under Work Experience are limited to a brief assessment process, followed by immediate and actual placement in a formal job site training experience.

The placement in the formal job site provides an individual with an opportunity to develop and improve marketable skills, obtain training and knowledge related to employability, and establish work history and work habits necessary to obtain unsubsidized employment. The placement in the formal job site also allows the participant to establish employment references.

During the assessment process, the WoRC Case Manager will match the individual's characteristics with a specific work experience training site. The

needs of the work experience training site, including background checks required for site placements involving children, elderly and disabled, and the employability needs of the participant will be considered for placement purposes. During the assessment process, only actual hours of case managed assessment activities will be reported as actual hours of participation. Assessment activities may include but are not limited to: career assessments, computer literacy skills, typing tests (10 key, data entry), TABE and PLATO – addressing Math, Reading, Science, Comprehension, Social Studies and employability needs assessments.

Once the assessment is completed, a formal work experience agreement is signed by the participant and the agency. This agreement titled “Work Experience Participant Agreement” (**Attachment A**) outlines the rights and responsibilities of the participant while involved in the work experience placement. The agreement also outlines the responsibilities of the work experience training site sponsor and the agency.

All work experience training site placements have a detailed training plan titled “Training Plan” (**Attachment B**) which outlines the specific skills the participant will be acquiring during their work experience placement. This training plan also includes the requirements of the evaluation component of the placement, including supervision and monitoring as outlined above. If the participant has a limiting condition based on a written statement from a qualified medical professional who is involved in the treatment of the participant which requires accommodations in the work experience training site, the accommodations are outlined in the Training Plan. The Training Plan is signed by both the participant and the work experience training site supervisor.

Work experience training site placements occur at private for-profit and non-profit organizations and public agencies that can provide services designed to improve the employability of those who cannot find unsubsidized employment. When a private-for-profit or non-profit organization or public agency agrees to participate as a work experience training site, they enter into a formal agreement with the agency. This formal agreement titled “Work Experience Site Agreement” (**Attachment C**) outlines the expectations of the agency regarding attendance records and reports on the progress of each participant, verification of scheduled and actual hours of participation, an outline of the skills the participant will gain in the work experience site and the responsibility of the work experience site to provide daily supervision and monitoring of the participant. The work site also agrees to maintain contact with the placing agency in regards to any concerns.

Montana is not a workfare state nor does it have a simplified food stamp program. At the beginning of Montana’s welfare reform project in 1995, the community work experience activity was clearly defined as training. Additional discussions in 1996-1997 with Department of Labor, USDA, and ACF following the TANF legislation reconfirmed that Montana’s community work experience structure and practices did meet the criteria for training.

The community work experience training sites meet the following criteria:

- The training, even though it includes actual operation of the facilities of the employer, is similar to that which would be given in a vocational school;
- The training is for the benefit of the trainees;
- The trainees do not displace regular employees, but work under close supervision;
- The employer that provides the training receives no immediate advantage from the activities of the trainees and, on occasion, his operations may even be impeded;
- The trainees are not necessarily entitled to a job at the conclusion of the training period; and
- The employer and trainees understand that the trainee is not entitled to wages for the time spent in training.

Since all of the above criteria apply, the trainees are not employees within the meaning of the Fair Labor Standards Act as outlined at <http://www.dol.gov/elaws/esa/flas/docs/trainees.asp>

2. *Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

The number of countable (negotiated) hours for this activity will be based upon the WEX assessment activities discussed and negotiated between the TANF participant and the WoRC case manager, the WEX training plan and agreement with the participant and the WEX supervisor, WEX schedule or signed statement by the WEX supervisor.

3. *Describe how the State verifies the actual hours of participation for this activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

Actual hours of participation will be verified via the following:

- Timesheets from the WEX placement site showing actual hours worked
- Activity logs from the WEX placement site
- Signed statement from the WEX supervisor attesting to the actual hours worked
- Actual hours of case managed assessment activities completed during the assessment process will be verified by the case manager

The TANF participant will have the responsibility to obtain and provide this verification. If necessary, the WoRC Case Manager will assist the participant in obtaining the verification. These verification documents will be signed by both the work experience site and the participant, attesting to the accuracy of the information. These verification documents will be submitted to the agency on a biweekly basis and serve as documentation and verification of the actual

(reconciled) hours worked. Hard copies of the verification documents will be maintained in the case file and a TEAMS case note will be entered indicating the type of verification documentation that was received and when, as well as the allowable number of hours that were reconciled and reported in the TANF File based on this verification.

As well, a monthly report is submitted to Central Office from the WoRC Case Manager indicating the actual hours for each WEX site, which can also be cross-matched to WEX timesheets and signed statements for verification.

4. *Describe the methods of daily supervision for each unpaid work activity.*

Daily supervision will be provided by the WEX supervisor at the work experience site. As part of the placement agreement, the work experience site agrees to provide this supervision and to report to the agency any concerns with participation, including arrival at the work site and participation.

For assessment activities, supervision will be provided by the individual who is conducting the assessment activity. This individual may be a career counselor, job service representative, WoRC program employee, supervisor at a job club, or supervisor of work-based learning activities. The WoRC agency will also continue to provide daily supervision by being accessible on a daily basis for assistance with assessment activities.

5. *Plan Documentation Specific to Work Experience.*

None.

On-the-job training

TEAMS Component Code: NA

1. *Describe the services or programs the State includes under the activity.*

This type of work activity is currently under consideration in Montana. We currently do not use this work activity as an allowable activity. Montana may choose to implement this type of activity in the future. If this activity is developed in the future, procedures would be developed to monitor/supervise, document, verify and report hours in this activity.

2. *Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

Not applicable at this time.

3. *Describe how the State verifies the actual hours of participation for this activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

Not applicable at this time.

4. *Describe the methods of daily supervision for each unpaid work activity.*

Not Applicable at this time.

5. *Plan Documentation Specific to On-the-Job Training*

Not Applicable at this time.

Job Search/Job Readiness Assistance
TEAMS Component Code: JBS
Primary Component

1. *Describe the services or programs the State includes under the activity.*

Service or activities that will be included under the Job Search/Job Readiness Activity include:

- Structured job search
- Searching for job openings
- Attending job club programs
- Applying for a specific vacancy
- Applying with a specific employer
- Job interviews (Note: Reasonable time spent traveling between multiple job interviews will be allowed. Travel time from home to the first job contact or interview or travel time from the last job contact or interview back to home will not be allowed.)
- Workshops or classes that provide skills in preparing to seek or obtain employment. These may include computer workshops or classes e.g., Excel or book keeping skills training; workshops including preparing a resume, job application or interviewing skills and participation in instruction or feedback in work place expectations; classes including resume writing classes, completing a job application and interviewing skills.
- Life skills training including basic life skills that will assist a participant in succeeding in employment. This training includes budgeting, interpersonal skills, decision making skills, time management, household management and balancing life and work.
- Actual hours of participation in substance abuse treatment when the treatment has been determined to be necessary and certified by a qualified medical or mental health professional (see definition below).

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- Actual hours of detoxification services for those who are otherwise employable when the services have been determined necessary and are certified by a qualified medical professional (see definition below)
 - Actual hours of participation in mental health treatment, therapy or other services designed to address mental or emotional disorders that can interfere with an individual's ability to work or look for work for those who are otherwise employable when the treatment, therapy or other services have been determined to be necessary and certified by a qualified medical or mental health professional (see definition below)
 - Actual hours of participation in rehabilitation activities such as physical therapy, occupational therapy and speech therapy for those who are otherwise employable when the treatment has been determined to be necessary and certified by a qualified medical or mental health professional. (see definition below) This may not include all activities or services provided by Vocational Rehabilitation Services.
 - Job Search/Job readiness assessment activities may include but are not limited to:
 - Career assessments
 - Computer literacy skills
 - Typing tests (10 key, data entry)
 - TABE
 - PLATO – addressing Math, Reading, Science, Comprehension, Social Studies.

For this section relating to Job Search/Job Readiness Assistance activities, we are defining a “qualified medical or mental health professional” as an individual who is currently licensed according to Montana Code Annotated (MCA) Title 37 and practicing in their field of expertise in the State of Montana, or in specific alcohol or drug treatment situations, an alcohol or substance abuse professional who is currently certified according to Montana Code Annotated (MCA) Title 37 and practicing in their field of expertise in the State of Montana. The professional may not be currently suspended from providing health care or diagnostics services by any government regulating agency. The “qualified medical or mental health professional” must be presently involved in the treatment of the individual.

Because Montana meets the definition of a “needy state”, this activity is time limited to 240 hours for a single custodial parent with a child under six years of age and 360 hours for all other work-eligible individuals within the preceding 12 month period. The TEAMS system will edit, “count” and track the hour limitation within the preceding 12 month period as well as the consecutive four week edit on the JBS component code. Updated policy will also be disseminated regarding this change effective October 1, 2008.

On a monthly basis, TANF policy personnel will check with the Food Stamp program to verify that Montana still meets the definition of a “needy state” based

on the growth in the average number of individuals participating in the Food Stamp program as outlined in CFR 260.30. In addition, TANF policy personnel will also check the <http://www.acf.hhs.gov> website, when available, to verify that Montana still meets the definition of a “needy state”. Although it is not anticipated, if there is a change in status, changes to the edits in the TEAMS system will be requested and updated policy will be disseminated immediately regarding this change.

2. *Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

The number of countable (negotiated) hours for this activity will be based upon a discussion and negotiation between the TANF participant and the WoRC Case Manager. In addition, if the activity includes mental health, substance abuse or rehabilitation activities, countable (negotiated) hours will be based on a treatment plan signed by a qualified medical or mental health professional (see definition above) and/or a schedule of therapeutic group meetings.

3. *Describe how the State verifies the actual hours of participation for this activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

Actual hours of participation will be verified via the following:

- Daily log of employment contacts that contains information on the employers that were contacted, how they were contacted, e.g., by phone, in person, over the internet, and a record of the time spent on each contact
- Copies of submitted employment applications and client statements as to the length of the interview, if one was offered
- Copies of completed assessment activities, resumes or job applications along with a daily log of time spent on these activities
- Attendance records from the service provider at job clubs or workshops
- Collateral contact with employment counselor or job developer
- Other realistic logs documenting time spent in job search activities
- Treatment plan documentation from the qualified medical or mental health professional
- Attendance records/verification from a qualified medical or mental health professional
- Progress reports from a qualified medical or mental health professional involved in the treatment
- Time sheets signed by the participant and assessment site supervisor attesting to the actual hours completed during the assessment process.

The TANF participant will have the responsibility to provide and/or obtain this verification. If necessary, the WoRC Case Manager will assist the participant in

obtaining the verification, provided a signed release of information form is present in the case file. These documents serve as documentation and verification of the actual hours worked. Hard copies of the verification will be maintained in the case file and a TEAMS case note will be entered indicating the type of verification that was received and when, as well as the allowable number of hours that were reconciled and reported in the TANF File based on this verification.

Verification documents must include the participant's name, actual hours of participation, the name of the employer/work site supervisor/service provider, and a name and phone number for contact purposes. WoRC Case Managers will randomly select 10% of their current caseload to review and reverify logged and reported activities and sign the verified log. In addition, WoRC monitors review and question any suspect activity claims at the twice-yearly reviews.

4. *Describe the methods of daily supervision for each unpaid work activity.*

Daily supervision for this activity may vary, depending on the type of activity the participant is involved in.

Mental health, detoxification, substance abuse or rehabilitation activities will be supervised by the medical or mental health professional providing the service or treatment.

For job search activities, supervision will be provided by the WoRC Case Manager through weekly contact with the participant. The WoRC agency will continue to provide daily supervision by being accessible on a daily basis for assistance with job search activities. When the WoRC Case Manager meets with the participant they will conduct a review of the job search log with the participant, and ask the participant to sign the log attesting to the accuracy of the document. Random reviews will also be conducted to verify hours of participation (see above).

For job readiness activities, supervision will be provided by the individual who is conducting the job readiness activity. This individual may be a job counselor, job service representative, WoRC program employee, or supervisor at a job club.

For assessment activities, supervision will be provided by the individual who is conducting the assessment activity. This individual may be a career counselor, job service representative, WoRC program employee, supervisor at a job club, or supervisor of work-based learning activities. The WoRC agency will also continue to provide daily supervision by being accessible on a daily basis for assistance with assessment activities.

5. *Plan Documentation Specific to Job Search/Job Readiness activity.*

If the State intends to count as substance abuse treatment, mental health treatment and rehabilitation activities, describe the criteria to establish and document the necessity of treatment or therapy.

In order to determine and document the necessity of treatment or therapy, the State will require a statement from a qualified medical or mental health professional indicating the treatment or therapy is necessary.

Describe the certification requirements for qualified medical or mental health professionals used in this process.

Even though certification is not required in the final rule, for this process we are defining a “qualified medical or mental health professional” as an individual who is currently licensed according to Montana Code Annotated (MCA) Title 37 and practicing in their field of expertise in the State of Montana, or in specific alcohol or drug treatment situations, an alcohol or substance abuse professional who is currently certified according to Montana Code Annotated (MCA) Title 37 and practicing in their field of expertise in the State of Montana. The professional may not be currently suspended from providing health care or diagnostics services by any government regulating agency. The “qualified medical or mental health professional” must be presently involved in treatment of the individual.

Describe how the State ensures that no more than six total weeks (four consecutive weeks) of job search and job readiness activities are reported in a fiscal year (or a total of 12 weeks in States that meet the definition of a “needy state” for the Contingency Fund.)

Because Montana meets the definition of a “needy state”, this activity is time limited to 240 hours for a single custodial parent with a child under six years of age and 360 hours for all other work-eligible individuals within the preceding 12 month period. The TEAMS system will edit, “count” and track the hour limitation within the preceding 12 month period as well as the consecutive four week edit on the JBS component code. Updated policy will also be disseminated regarding this change effective October 1, 2008.

On a monthly basis, TANF policy personnel will check with the Food Stamp program to verify that Montana still meets the definition of a “needy state” based on the growth in the average number of individuals participating in the Food Stamp program as outlined in CFR 260.30. In addition, TANF policy personnel will also check the <http://www.acf.hhs.gov> website, when available, to verify that Montana still meets the definition of a “needy state”. Although it is not anticipated, if there is a change in status, changes to the edits in the TEAMS system will be requested and updated policy will be disseminated immediately regarding this change.

Community Service Programs
TEAMS Component Code: CSP
Primary Component

1. *Describe the services or programs the State includes under the activity.*

Services or programs that will be included under the Community Service Programs activity include structured programs in which the TANF participants perform volunteer work for the direct benefit of the community under the auspices of public or nonprofit organizations. The service must serve a useful community purpose and must be designed to improve the employability of the participant. Assessment activities may also be included to determine a participant's suitability for a particular CSP activity. The assessment activities may include but are not limited to: career assessments, computer literacy skills, typing tests (10 key, data entry), TABE and PLATO – addressing Math, Reading, Science, Comprehension, Social Studies and employability needs assessments.

Specific community service placements include:

- Head Start agencies
- Churches
- Libraries
- Area Schools
- YMCA/YWCA
- Soup Kitchens/food pantries
- Habitat for Humanity
- Montana Hope Project
- Meals on Wheels
- Senior Citizen Centers
- Nursing Homes
- Hospitals
- Homeless shelters
- Historical Society
- Approved non-profit organizations
- Approved public organizations
- Treatment or group homes when the individual fulfills duties that benefit all the residents such as preparing meals, housecleaning or scheduling group activities

2. *Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

Countable (negotiated) hours of participation in this activity will be based upon a negotiation between the participant and the WoRC Case Manager, as well as the Informal placement agreement between the Community Service Program and the

participant. If the participant has a schedule for the Community Services Program site that can be provided as well.

3. *Describe how the State verifies the actual hours of participation for this activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

Actual hours of participation will be verified via the following:

- Daily timesheets from the CSP placement signed by an authority from the volunteer organization
- Daily activity logs signed by an authority from the volunteer organization
- Signed statement from the CSP placement supervisor
- Copies of completed assessment activities along with a daily log of time spent on these activities
- Time sheets signed by the participant and assessment site supervisor attesting to the actual hours completed during the assessment process

The TANF participant will have the responsibility to obtain and provide this verification. If necessary, the WoRC Case Manager will assist the participant in obtaining the verification, provided a signed release of information form is present in the case file. These documents will be signed by both the community service provider and the participant, attesting to the accuracy of the information. These documents will be submitted to the agency on a weekly basis and serve as documentation and verification of the actual hours worked. Hard copies of the verification will be maintained in the case file and a TEAMS case note will be entered indicating the type of verification that was received and when, as well as the allowable number of actual hours that were reconciled and reported in the TANF File based on this verification.

4. *Describe the methods of daily supervision for each unpaid work activity.*

Daily supervision will be provided by the supervisor at the community service program site. As part of the placement agreement, the community service site agrees to provide this supervision and to report to the agency any concerns with participation, including arrival at the community service site and participation.

For assessment activities, supervision will be provided by the individual who is conducting the assessment activity. This individual may be a career counselor, job service representative, WoRC program employee, supervisor at a job club, or supervisor of work-based learning activities. The WoRC agency will also continue to provide daily supervision by being accessible on a daily basis for assistance with assessment activities.

5. *Plan Documentation Specific to Community Service Programs.*

Describe how the types of community service positions that create an

employer/employee relationship and are subject to the FLSA minimum wage requirements will be determined.

All of the Community Service Programs that will be allowed as work activities have a volunteer component to them. Per Montana State Law, Montana Code Annotated (MCA) 37-71-118, "volunteer" means a person who performs services on behalf of an employer, but who does not receive wages. Based on this, we believe community service volunteer positions are not subject to the FLSA minimum wage requirements.

If the State permits self-initiated community service positions, describe how it determines that the position provides a direct community service and improves the recipient's employability.

Montana will permit self-initiated community service positions provided the position meets the following criteria:

- The position is in a structured program that directly benefits the community in that the service provides a useful community service
- The position is in a recognized volunteer site
- The position is designed to improve the participant's employability by providing a recent job reference upon completion or providing experience that could be included on a resume.

Vocational Educational Training
TEAMS Component Code: STT
Primary Component

1. Describe the services or programs the State includes under the activity.

Services or programs included under this activity include organized educational programs directly related to career and technical education. This activity may include on-line or distance learning components, if participation in the class, monitoring and supervision are provided and verified.

Specific programs included in this activity include career and technical training programs provided by employment and training contractors with the State, career and technical schools and degree or certificate programs at secondary and post secondary educational institutions. Required clinical participation, lab work or internships required for the training programs are considered to be part of the primary activity for which they are required and are allowable. Supervised study hall and unsupervised homework time are allowable under this activity. Up to one hour of unsupervised homework time may be counted for each hour of class/lab time. Total homework time counted for participation cannot exceed the hours required or advised by a particular education program.

Assessment activities may also be included to determine a participant's suitability for a particular STT activity. These activities may include but are not limited to: career assessments, computer literacy skills, typing tests (10 key, data entry), TABE and PLATO – addressing Math, Reading, Science, Comprehension, Social Studies.

Allowable career and technical educational training placements include:

- A Baccalaureate or advanced degree program
- Associate in Science degrees in the following categories:
 - Accounting
 - Architectural Design
 - Automotive Service Management
 - Aviation Operations
 - Building Construction Technology
 - Business Administration
 - Business marketing Management
 - Civil Engineering Technology
 - Computer Engineering
 - Criminal Justice Technology
 - Culinary Management
 - Dental Hygiene
 - Drafting and Design
 - Early Childhood Management
 - Electronics Technology
 - Fire Science Technology
 - Graphic Design Technology
 - Interior Design
 - Legal Assisting
 - Medical Laboratory Technician
 - Registered Nurse, RN
 - Radiography
 - Respiratory Care
- Vocational Certificates in the following categories:
 - Airframe and Power Mechanics
 - Auto Collision Repair
 - Automotive Machine Shop
 - Automotive Service Technician
 - Barbering
 - Brick Masonry
 - Carpentry
 - Child Care Center Operator
 - Corrections Officer
 - Cosmetology
 - Credit Union Service Marketing

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- Dental Assisting
 - Electricity
 - Facials Specialty
 - Heating and Air Conditioning
 - Massage Therapy
 - Medical Secretary
 - Nails Specialty
 - Network Support Services
 - Office Systems Specialist
 - Paramedic
 - Plumbing
 - Practical Nursing
 - Teller Training
 - Travel Agency Operations
 - Webmaster and Web Development

Other organized educational programs that are directly related to the preparation of individuals for employment for current or emerging occupations requiring training other than a baccalaureate or advanced degree may be added when the Work Verification Plan is updated.

2. *Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

Countable (negotiated) hours of participation in this activity will be based on the following:

- Class schedule
- Lab or clinical schedule
- Supervised study hall schedule
- Letter from school advisor or instructors
- Verification of enrollment in the course
- Verification of or receipt of payment to enroll in on-line or distance learning components
- Class syllabus

Countable (negotiated) hours of participation in assessment activities under the STT component will be based upon discussion and negotiation between the TANF participant, WoRC Case Manager and/or academic advisor.

3. *Describe how the State verifies the actual hours of participation for this activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

Actual hours of participation in this activity will be based on the following:

- Attendance records

-
- Time sheets signed by participant and class instructor/supervisor
 - Activity logs signed by participant and class instructor/supervisor
 - Log-in and on-line activity reports
 - Letter from school advisor or instructors
 - Other methods of verification via technology as available
 - Copies of completed assessment activities along with a daily log of time spent on these activities
 - Time sheets signed by the participant and assessment site supervisor attesting to the actual hours completed during the assessment process

The TANF participant will have the responsibility to obtain and provide this verification. If necessary, the WoRC Case Manager will assist the participant in obtaining the verification, provided a signed release of information form is present in the case file. These documents will be signed by the training provider, instructor or study hall monitor and the participant, attesting to the accuracy of the information. These documents will be submitted to the agency on a monthly basis and serve as documentation and verification of the hours worked. Hard copies of the verification will be maintained in the case file and a TEAMS case note will be entered indicating the type of verification that was received and when, as well as the allowable number of hours that were reconciled and reported in the TANF File based on this verification.

4. *Describe the methods of daily supervision for each unpaid work activity.*

Daily supervision will be provided by the educational facility faculty, class instructor, instructional aides, lab supervisors, or supervisors of work-based learning activities. If the activity involves on-line or distance learning, the supervision will be provided by a supervisor at the WoRC Office if the on-line or distance learning is taking place at the WoRC Office. If the activity is being done at home or at a site separate from the WoRC Office, the supervision will be provided by the State confirming the requirement for logging onto the on-line learning component, tracking of the time spent in the on-line learning component, and online activity reports being available to the WoRC Case Manager. Other methods of verification and supervision via technology may be used with prior approval.

5. *Plan Documentation Specific to Vocational Educational Training*

Describe how the State ensures participation in vocational educational training does not count beyond the statutory limitations limiting participation to 12 months lifetime per individual.

The automated eligibility and case management system, TEAMS, uses computer logic and code to “count” and track the 12 month limitation per individual on the STT component code that is used to indicate this type of activity. When a participant has used the 12 months, the computer code and logic will not allow

the component code to be used as an activity, either during negotiation or reconciliation. An error edit is given to the WoRC Case Manager and the component may not be used. As well, the months of participation in vocational educational training are manually tracked by the WoRC Case Manager.

Explain how the State will ensure that basic and remedial education and English as a Second Language (ESL), if such activities are counted and are necessary of regular part of vocational educational training.

Basic and remedial education and English as a Second Language (ESL) may only be allowed under the Vocational Educational Training activity if the vocational educational provider indicates these are required to participate in the Vocational Educational Training activity/program. A statement attesting to the requirement must be obtained from the vocational educational provider. As well, these activities must be approved by the WoRC Monitors once the need and scope for the use of these activities has been defined. WoRC Monitors will be reviewing the use of these activities on a quarterly basis.

Job Skills Training (directly related to employment)

TEAMS Component Code: JST

Secondary Component

1. *Describe the services or programs the State includes under the activity.*

Services or programs that will be included under the Job Skills Training activity include training and education for job skills required by an employer to provide the TANF participant with the ability to obtain employment; advance in the workplace or adapt to the changing demands of the workplace. This activity can include customized training to meet the needs of a specific employer or it can be general training that prepares an individual for employment. Required clinical participation, lab work or internships required for the training programs are considered to be part of the primary activity for which they are required and are allowable. Supervised study hall and unsupervised homework time are allowable under this activity. Up to on one hour of unsupervised homework time may be counted for each hour of class/lab time. Total homework time counted for participation cannot exceed the hours required or advised by a particular education program.

Specific programs include:

- Computer Classes, e.g., Excel, Word, Power Point, etc.
- Typing class, if required for job placement
- CNA Classes
- ESL or language instruction if necessary for a specific job or job training program
- Other education that enhances an individual's ability to obtain employment or to advance in existing employment

-
- Training for job skills required by an employer
 - Programs described in the Vocational Educational training activity above
 - Post-secondary education including baccalaureate and advanced degree programs that are directly related to employment in “High Demand Occupations” as outlined by the Department of Labor. The participant in these programs must:
 - Have exhausted their 12 months of short term training allowed in regulation;
 - Qualify as a full-time student by being enrolled at least 12 credit hours each semester or 30 credit hours per year; and
 - Complete an application packet which includes a comprehensive plan for completing the degree program while fulfilling hours of allowable work activities above and beyond the hours allowed in this activity.
 - JST assessment activities may include but are not limited to:
 - Career assessments
 - Computer literacy skills
 - Typing tests (10 key, data entry)
 - TABE
 - PLATO – addressing Math, Reading, Science, Comprehension, Social Studies.

2. *Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

Countable hours of participation in this activity will be based on the following:

- Training schedule
- Letter from training supervisor
- Letter from employer regarding the need for the training
- Verification of enrollment in training
- Class schedule
- Lab or clinical schedule
- Supervised study hall schedule
- Letter from school advisor or instructors
- Verification of enrollment in the course
- Class syllabus

Countable (negotiated) hours of participation in assessment activities under the JST component will be based upon discussion and negotiation between the TANF participant, the WoRC Case Manager and/ or a supervisor of other work based learning activities.

Describe how the State verifies the actual hours of participation for this activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

Actual hours of participation in this activity will be based on the following:

- Attendance records
- Time sheets signed by participant and training or class instructor/supervisor
- Activity logs signed by participant and training or class instructor/supervisor
- Log-in and on-line activity reports
- Letter from school advisor or instructors
- Copies of completed assessment activities along with a daily log of time spent on these activities
- Time sheets signed by the participant and assessment site supervisor attesting to the actual hours completed during the assessment process

The TANF participant will have the responsibility to provide this verification. If necessary, the WoRC Case Manager will assist the participant in obtaining the verification, provided a signed release of information form is present in the case file. These documents will be signed by the training provider, instructor or study hall monitor, assessment site supervisor and the participant, attesting to the accuracy of the information. These documents will be submitted to the agency on a weekly basis and serve as documentation and verification of the hours worked. Hard copies of the verification will be maintained in the case file and a TEAMS case note will be entered indicating the type of verification that was received and when, as well as the allowable number of hours that were reconciled and reported in the TANF File based on this verification.

3. *Describe the methods of daily supervision for each unpaid work activity.*

Daily supervision will be provided by the training instructor, class instructor, instructional aides, lab supervisors, or supervisors of work-based learning activities. The WoRC agency will also continue to provide daily supervision by being accessible on a daily basis for assistance with assessment activities.

4. *Plan Documentation Specific to Job Skills Training*

None.

Education directly related to Employment

TEAMS Component Code: ABE

Secondary Component

1. *Describe the services or programs the State includes under the activity.*

Service or programs that will be included under the Education Directly Related to Employment activity include education directly related to a specific occupation, employment or employment offer, in the case of a TANF participant who has not received a high school diploma or certificate of high school equivalency

Supervised study hall and unsupervised homework time are allowable under this activity. Up to on one hour of unsupervised homework time may be counted for each hour of class/lab time. Total homework time counted for participation cannot exceed the hours required or advised by a particular education program.

This component code will be limited to individuals over the age of 20. The editing for this limitation is completed via computer coding and logic on the TEAMS system.

Specific programs/activities include:

- Adult Basic Education
- English as a Second Language (ESL)
- GED Classes
- GED testing to acquire certification
- Literacy skills
- Customized or general training that will prepare an individual for employment
- ABE assessment activities may include but are not limited to:
 - Career assessments
 - Computer literacy skills
 - Typing tests (10 key, data entry)
 - TABE
 - PLATO – addressing Math, Reading, Science, Comprehension, Social Studies.

2. *Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

Countable (negotiated) hours of participation in this activity will be based on the following:

- Activity logs
- Timesheets
- Class schedule
- Letter from class instructor
- Verification of enrollment in class
- Class syllabus

Countable (negotiated) hours of participation in assessment activities under the ABE component will be based upon discussion and negotiation between the TANF participant, WoRC Case Manager and/or academic advisor.

3. *Describe how the State verifies the actual hours of participation for this activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

Actual hours of participation in this activity will be based on the following:

- Class attendance records
- Report from class instructor verifying hours of participation
- Timesheets signed by instructors
- Copies of completed assessment activities along with a daily log of time spent on these activities
- Time sheets signed by the participant and assessment site supervisor attesting to the actual hours completed during the assessment process

The TANF participant will have the responsibility to provide and/or obtain this verification. If necessary, the WoRC Case Manager will assist the participant in obtaining the verification, provided a signed release of information form is present in the case file. Hard copies of the verification will be maintained in the case file and a TEAMS case note will be entered indicating the type of verification that was received and when, as well as the allowable number of hours that were reconciled and reported in the TANF File based on this verification.

4. *Describe the methods of daily supervision for each unpaid work activity.*

Daily supervision will be provided by the training instructor, class instructor, instructional aides, lab supervisors, or supervisors of work-based learning activities. The WoRC agency will also continue to provide daily supervision by being accessible on a daily basis for assistance with assessment activities.

5. *Plan Documentation Specific to Education Directly Related to Employment*

Describe the State's criteria for "progress" and when and how it is documented.

Montana's criteria for "progress" will be based on the academic criteria necessary to achieve completion of the course, or to be allowed to continue in the course. This progress will be documented in the case file by grade records or a report from the educational institution or instructor. If the class instructor indicates the participant is not making progress, this will be considered sufficient evidence for failing to make "progress."

Satisfactory Attendance in a secondary school/GED program

TEAMS Component Code: HSE

Primary Component

1. Describe the services or programs the State includes under the activity.

Service or programs that will be included under the Satisfactory Attendance in a secondary school/GED program include regular attendance, in accordance with the requirements of the secondary school or course of study at a secondary school, or in a course of study leading to a certificate of general equivalency, in

the case of a participant who has not completed secondary school or received such a certificate. Supervised study hall and unsupervised homework time are allowable under this activity. Up to on one hour of unsupervised homework time may be counted for each hour of class/lab time. Total homework time counted for participation cannot exceed the hours required or advised by a particular education program.

This component code will be limited to individuals under the age of 20. The editing for this limitation is completed via computer coding and logic on the TEAMS system.

Specific programs/activities include:

- Adult Basic Education
- English as a Second Language (ESL)
- GED Classes
- HSE Assessment Activities may include but are not limited to:
 - Career assessments
 - Computer literacy skills
 - Typing tests (10 key, data entry)
 - TABE
 - PLATO – addressing Math, Reading, Science, Comprehension, Social Studies.

2. *Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

Countable hours of participation in this activity will be based on the following:

- Activity logs
- Timesheets
- Class schedule
- Letter from class instructor
- Verification of enrollment in class
- Class syllabus

Countable (negotiated) hours of participation in assessment activities under the HSE component will be based upon discussion and negotiation between the TANF participant, WoRC Case Manager and/or academic advisor.

3. *Describe how the State verifies the actual hours of participation for this activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

Actual hours of participation in this activity will be based on the following:

- Class attendance records
- Report from class instructor verifying hours of participation

- Timesheets signed by instructors
- Copies of completed assessment activities along with a daily log of time spent on these activities
- Time sheets signed by the participant and assessment site supervisor attesting to the actual hours completed during the assessment process

The TANF participant will have the responsibility to provide and/or obtain this verification. If necessary, the WoRC Case Manager will assist the participant in obtaining the verification, provided a signed release of information form is present in the case file. Hard copies of the verification will be maintained in the case file and a TEAMS case note will be entered indicating the type of verification that was received and when, as well as the allowable number of hours that were reconciled and reported in the TANF File based on this verification.

Describe the methods of daily supervision for each unpaid work activity.

Daily supervision will be provided by the training instructor, class instructor, instructional aides, lab supervisors, or supervisors of work-based learning activities. The WoRC agency will also continue to provide daily supervision by being accessible on a daily basis for assistance with assessment activities.

4. *Plan Documentation Specific to Satisfactory attendance at a secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate.*

Describe the State's criteria for "progress" and when and how it is documented.

Montana's criteria for "progress" will be based on the academic criteria necessary to achieve completion of the course, or to be allowed to continue in the course. This progress will be documented in the case file by grade records or a report from the educational institution or instructor. If the class instructor indicates the participant is not making progress, this will be considered sufficient evidence for failing to make "progress."

Providing Child Care for a Participant in Community Service Program
TEAMS Code: NA

1. *Describe the services or programs the State includes under the activity.*

This type of work activity is currently under consideration in Montana. We currently do not use this work activity as an allowable activity. Montana may choose to implement this type of activity in the future. At that time the Work Verification Plan would be amended.

2. *Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.*

Not applicable at this time.

3. *Describe how the State verifies the actual hours of participation for this activity. Include the procedures for obtaining and maintaining documentation of hours of participation.*

Not applicable at this time.

4. *Describe the methods of daily supervision for each unpaid work activity.*

Not applicable at this time.

5. *Plan Documentation Specific to Providing Child Care for a Participant in Community Services Program. None*

Section 2

Hours Engaged in Work

Excused Absences:

1. *Describe the State's excused absence policies for unpaid work activities. This includes its policies for holidays as well as the ten additional excused absences that the State may count in a preceding 12-month period. If the policies vary by work activity, the State should describe how they vary and for what activities.*

Eighty hours of excused absences for unpaid work activities will be allowed in a preceding 12-month time period. These excused absences will be recorded in the case file, not to exceed sixteen hours in a month. The TEAMS system will "count" and track the excused absences on an hourly basis and edit for the use of sixteen hours in a month. Updated policy will also be disseminated regarding this change effective October 1, 2008.

In order to use excused absence hours, a participant must first show good cause for failing to complete the unpaid work activities as negotiated. These good cause reasons include:

- Temporary illness of either the participant or a child in the home of less than one week. (If illness continues for more than one week, medical documentation should be requested).
- Lack of transportation, due to breakdown, etc.
- No child care available on a short term basis
- Death in family

If the participant has good cause as outlined above and has excused absence hours available, the actual hours assigned to the activity will be excused.

If the participant has good cause as outlined above, but has used sixteen hours for the month; or has used their eighty hours in the preceding 12-month time period, the unpaid work activities will be recorded as incomplete, however, no recommendation for sanction will occur.

If the participant does not have good cause as outlined above, even if excused absence hours are available, the work activities will be recorded as incomplete and a recommendation for sanction will occur.

Montana has described the excused absence for holiday policy as follows:

The ten holidays from unpaid work activities will be on a Federal Fiscal year basis (October 1 – September 30). Participants will be allowed a holiday if they are involved in unpaid work activities, were scheduled to participate in the unpaid

work activity and the activity site was closed due to a holiday. If these criteria are met, the work activities will be considered to have been completed in full.

Participants will be limited to a total of 10 holidays in the Federal fiscal year. A list of holidays the participant may use are as follows:

Columbus Day
Veteran's Day
Thanksgiving
Christmas
New Year's Day
Martin Luther King, Jr. Day
President's Day
Memorial Day
4th of July
Labor Day

These holiday absences will be recorded in the case file and a TEAMS case note will be entered indicating when excused absences hours for a holiday have been used.

FLSA Deeming:

2. *If the State wishes to use the "deeming" provision permitted at 261.31 and 261.32 for work experience or community service programs, describe how the State determines the work hours requirement.*

Montana is not using the "deeming" provision, based on its definition of Work Experience and Community Service Programs. (See Section 1).

Section 3
Work Eligible Individuals

1. *Describe the State's procedures for identifying all work eligible individuals, as defined at 261.2. This should include the procedures needed to identify a non-recipient parent excluded from the definition of a work-eligible individual. These are:*
 - *A minor parent who is not the head-of-household and not spouse of the head-of-household;*
 - *An alien who is ineligible to receive assistance due to his/her immigration status; and*
 - *At State option, on a case-by-case basis, a recipient of Supplementary Security Income (SSI) or Supplementary Security Disability Income (SSDI) benefits.*
 - *A parent caring for a disabled family member living in the home, provided that such care is supported by medical documentation.*

The following procedures will be used to identify work-eligible individuals as well as to identify non-recipient parents who are excluded from the definition of a work-eligible individual.

Work-eligible individuals in Montana will include the following:

- Any adult receiving assistance under TANF;
- Any minor child head of household receiving assistance under TANF;
- Any non-recipient parent living with a child receiving assistance, including
 - Parents sanctioned due to non-compliance with work requirements;
 - Parents disqualified due to intentional program violations;
 - Parents disqualified due to being a fleeing felon;
 - Parents disqualified due to parole or probation violation; and
 - Parents disqualified for other reasons.

Within the automated eligibility and case management system, TEAMS, OPA Case Managers assign specific participation codes, disqualification reason codes and an adult/child indicator to each individual who is in the TANF filing unit or household. An outline of the pertinent participation codes, disqualification reason codes and the adult/child indicators is below:

Participation Codes:

- 'IN' means the individuals are included in the assistance unit; their needs are included in the TANF grant.
- 'DQ' means the individuals are not included in the assistance unit, their needs are not included in the TANF grant so they are considered a 'non-recipient', but their income and resources are considered to be available to the household.

- 'OU' identifies individuals who are no longer in the filing unit or household or adult SSI recipients who are not included in the TANF assistance unit.

If an individual is coded with a participation code of 'DQ', TEAMS requires the worker to enter a Disqualification Reason Code which identifies the reason for the disqualification. The following are the valid disqualification codes:

- 'IA' means ineligible alien
- 'SN' means sanctioned for non-compliance with work activities
- 'IF' means either an intentional program violator or convicted of misrepresentation of residency in order to obtain benefits in two or more states
- 'FF' means the individual is a fleeing felon
- 'OT' means the individual is temporarily disqualified for failure to meet an eligibility requirement.
- 'TP' means a teen parent who is not approved to be living independently. (results in case denial or closure)
- 'DR' means a convicted drug felon not in compliance (results in case denial or closure)
- 'IS' means failure to provide or apply for an SSN (results in case denial or closure)

As well, the worker enters an Adult/Child Indicator which indicates whether or not this individual is considered an adult, for purposes of the TANF Data File and also used to determine certain eligibility requirements. Valid adult/child indicators are as follows:

- 'A' is an adult over the age of 18 or an emancipated minor.
- 'I' is a teen parent approved to be living independently and considered the head of the household or the spouse of the head of the household.
- 'C' is a child, under the age of 18.
- 'T' is a teen, who is not attending school, living with caretaker relative.
- 'F' is a teen parent not living independently, not considered the head of the household or the spouse of the head of the household, not in school.
- 'N' is a teen parent not living independently, not considered the head of the household or the spouse of the head of the household, in school.

TEAMS requires the Eligibility Case Manager to indicate whether or not the adults in the household are related by parentage to the children in the household or if they are caretaker relatives. This is accomplished by completing the Parental Connection/Relationship Screen (PACR) in TEAMS.

Based on these participation codes, disqualified reason codes, adult/child indicators, and information on the PACR screen, ONLY the following will be identified as a work-eligible individual and mandated to participate in work activities:

Individuals with an adult/child indicator of 'A' or 'I'; a parent connection to the child on PACR and a participation code of:

- 'IN'
- 'DQ/SN'
- 'DQ/IF'
- 'DQ/FF'
- 'DQ/OT'

If an individual does not meet the above criteria to be considered a work-eligible individual, such as an ineligible alien, he or she will not be identified as a work-eligible individual and will be excluded from the definition of a work-eligible individual.

Individuals who are coded 'DQ/TP'; 'DQ/DR' or 'DQ/IS' are not considered work-eligible individuals as they cause the entire household to lose eligibility for TANF cash assistance.

Montana has chosen to not include SSI as work-eligible individuals at this time.

Montana has not chosen to include SSDI individuals as being excluded work-eligible individuals at this time as receipt of SSDI usually results in case closure based on income. If Montana chooses to take this option at a later date, the Work Verification Plan would be updated.

2. *The State should also describe its procedures for identifying a parent caring for a disabled family member, who may also be excluded from the definition of a work-eligible individual. The procedures should define the terms "disabled" and "family member." This should include a means of ensuring that the need for care in the home is supported by medical documentation and describe the nature of the medical documentation used to make such determinations. If the State includes in this group parents caring for a family member with a temporary disability, the State must describe its procedures for determining when the family member is no longer disabled and ensuring that the parent is then identified as a work-eligible individual.*

In order to identify a parent or caretaker relative caring for a disabled family member and exclude that individual from being identified as a work-eligible individual, Montana has implemented the use of a new work activity component code on TEAMS.

This new code of NIH (Needed in the Home) will be put on the FIA/EP of individuals who are excluded from being defined as work-eligible individuals. If at anytime during the month this code is present on the FIA/EP of the participant, he or she will be excluded from being included in the calculation of the work participation rate. This component code must have approval from the WoRC Monitor prior to being entered on the FIA/EP, must have a start and end date

entered on the code, must be reviewed at least quarterly in order to continue, and must have supporting medical documentation.

Disabled:

For the purposes of the NIH exclusion, “disabled” is defined as an individual who is temporarily or permanently disabled based on a statement from a “qualified medical or mental health professional” defined in this section as an individual who is currently licensed according to Montana Code Annotated (MCA) Title 37 and practicing in their field of expertise in the State of Montana. The professional may not be currently suspended from providing health care or diagnostics services by any government regulating agency. The “qualified medical or mental health professional” must be presently involved in the treatment of the individual.

Montana will allow this exclusion if the family member is temporarily disabled, again based on a statement from a “qualified medical or mental health professional” defined above. Once the temporary disability is no longer valid, based on a statement from the “qualified medical or mental health professional”, the component code will be removed from the FIA/EP and the individual, if otherwise a work-eligible individual based on criteria outlined above, will be mandated to participate in allowable work activities.

Family Member:

For the purposes of the NIH exclusion, “family member” is defined as an individual related by blood or marriage within the 5th degree of kinship, living in the home, which replicates eligibility rules.

In order to ensure that this component code and exclusion is being properly used, a monthly report will be created off TEAMS identifying all individuals with this component code. This report will be reviewed by the WoRC Monitors, WoRC Case Managers and supervisors on a monthly basis for accuracy.

Other items related to work-eligible individuals:

Incapacitated individuals:

Because TANF is subject to Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 and Civil Rights regulations, Montana has implemented the use of a new work activity component code on TEAMS to identify individuals who are totally temporarily disabled/incapacitated according to state criteria and therefore will be excluded from participation in allowable work activities. Typically, this might be a woman with a high-risk pregnancy who is ordered to total bed rest, a recuperating trauma victim, or rapid onset of a total disability with the person in the SSI process.

These individuals are considered a work-eligible individual and are included in the calculation of the work participation rate. Montana acknowledges that they will count against us in the calculation of the work participation rate.

This new code of NPI (Not Participating due to Incapacity) will be put on the FIA/EP of individuals who have provided current medical verification of temporary or permanent total disability/incapacity from a “qualified medical or mental health professional” defined in this section and for this purpose as an individual who is currently licensed according to Montana Code Annotated (MCA) Title 37 and practicing in their field of expertise in the State of Montana. The professional may not be currently suspended from providing health care or diagnostics services by any government regulating agency. The “qualified medical or mental health professional” must be presently involved in the treatment of the individual. The medical verification must be specific to the disability/incapacity and must be a signed document on letterhead. The statement should also include a timeframe of expected disability/incapacity.

This component code must have approval from the WoRC Monitor prior to being entered on the FIA/EP, must have a start and end date entered on the code, and must be reviewed at least monthly in order to continue.

In order to ensure that this component code and exclusion is being properly used, a monthly report will be generated from TEAMS identifying all individuals with this component code. This report will be reviewed by the WoRC Monitors, WoRC Case Managers and supervisors on a monthly basis for accuracy.

Again, because TANF is subject to Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 and Civil Rights regulations, if an individual provides current medical verification of temporary or permanent partial disability/incapacity from a “qualified medical or mental health professional” (see definition above) every effort will be afforded to allow the individual to participate in allowable work activities to the best of their ability.

If the medical verification indicates the need for accommodations, reasonable accommodations will be provided to allow the individual to participate to the best of their ability. Accommodations are defined as an adjustment to a work activity, the environment or the manner in which work is usually done to reduce or eliminate the barriers to enable an individual with a limitation to participate.

The individual will not be subject to sanction if they participate in allowable work activities to the extent they are capable, based on the medical verification. The actual number of participation hours will be reported in the TANF File, which will often have a negative impact on the work participation rate. However, Montana feels that the regulations cited above support this decision.

No child care available:

Montana has also implemented the use of a new work component code on TEAMS to identify participants who have a child in the home under the age of six and have no long term child care available. If at anytime during the month this code is present on the FIA/EP of the participant, he or she will be coded exempt

under the work participation status section of the TANF Data Report/File and will have a negative impact on the work participation rate. The individual cannot be penalized for failing to participate in work activities.

This new code of NCC (No long-term Child Care) will be put on the FIA/EP of adult participants who are unable to locate appropriate, long-term child care and therefore unable to participate in work activities, as long as the inability to locate appropriate, long-term child care is through no fault of their own, such as failure to pay child care co-payments or child care overpayments. Verification of the lack of appropriate, long-term child care must be provided via a signed statement from the Resource and Referral (Child Care) Agency that serves the area in which the participant resides.

This component code must have approval from the WoRC Monitor prior to being entered on the FIA/EP, must have a start and end date entered on the code, and must be reviewed at least quarterly in order to continue. As well, TEAMS will edit to ensure that this component code is not allowed if there is no child under the age of six (6) in the household.

In order to ensure that this component code is being properly used, a monthly report will be created off TEAMS identifying all individuals with this component code. This report will be reviewed by the WoRC Monitors, WoRC Case Managers and supervisors on a monthly basis for accuracy.

Tribal NEW:

Participants referred to Tribal NEW are work-eligible individuals however Montana will disregard all participants referred to Tribal NEW from the calculation of the work participation rate. This disregarding will be accomplished by coding these participants with a '05' in the Work Participation Status (Item #49) field in the TANF File.

3. *Describe verification procedures for ensuring the accuracy in reporting of work-eligible individuals on the TANF Data Report and the SSP-MOE Data report, including:*
- *The correct reporting of the Work Participation Status of all adult (or minor child head-of-household) family members; and*
 - *The proper identification of TANF families for inclusion in only the overall work participation rate or the overall and two-parent work participation rates, or exclusion from both the overall and two-parent work participation rates.*

In order to ensure the accuracy of the reporting of work-eligible individuals, work participation status and proper identification of TANF families for inclusion in the correct work participation rate, the State has implemented the following procedures:

- System training regarding the correct coding of allowable work activities, adult/child indicators, participation codes and other system codes that are used in the identification of work participation status and type of family in the TANF Data File
- Policy guidelines and directives as to the accurate use of work activities and the verification/documentation of work activities
- TEAMS edits to ensure proper hours are entered regarding each work activity
- Case reviews completed by the eligibility worker's supervisors
- Ongoing training for eligibility staff provided by training specialists
- Training manual for the TANF program
- Policy manuals, instructions and bulletins
- Regional policy specialists who assist with policy questions
- TEAMS edits to ensure time-limited components are used correctly
- Case reviews conducted by WoRC Supervisors and WoRC monitors
- System reports identifying work activities, hours of participation and reconciliation practices
- System reports identifying use of specific work activities that must be approved by the WoRC Monitors prior to being used as an allowable work activity
- TEAMS reports of TANF File Data

As mentioned in the introduction, the Eligibility Case Managers enter information into the automated eligibility and case management system (TEAMS) regarding household composition, relationships within the household and an indicator of whether or not each individual receiving TANF cash assistance is considered an adult or a child. These factors are used in the determination of whether or not an individual is a work-eligible individual and if the household meets the definition to be included in the overall work participation rate or the overall and two-parent participation rate. These factors also determine if the household is excluded from both the overall and two-parent rate.

The WoRC Case Managers enter information regarding allowable work activities as well as the actual hours of participation in each of the allowable work activities. Policy instructions indicate the acceptable forms of documentation of participation in allowable work activities and both supervisory and monitor reviews ensure the information is available in the case files.

System edits are in place to ensure that only allowable work activities (as described in Section 1) are used to determine participation. As well system edits ensure that negotiated hours meet an established minimum, to ensure the requirement to agree to participate fully in allowable work activities is met prior to benefits being issued.

The information entered by the WoRC Case Managers as well as the system edits ensure that the Work Participation Status of all adult and minor child head-of-households is accurately reported in the TANF Data Report/File.

Once the information is collected on the system, TEAMS processes the TANF Data Report/File. As the TANF Data Report/File is compiled, at numerous points throughout the process reports are run off the TEAMS system and reviewed for accuracy in the report. State personnel and contracted computer engineers work together throughout the file submission process to ensure the accuracy of the report. Once the report has been submitted and errors returned, State personnel work with the contracted computer engineers to resolve the errors and resubmit the files.

A document outlining specific instructions regarding the submission of the TANF Data Report/File is attached. This document outlines the instructions for determining how the work participation status is determined as well as the identification of the family type for purposes of calculating the work participation rate. This document also provides explicit detail on how cross checks are done throughout the file process to ensure the family and household are reported accurately in all sections of the TANF Data Report/File. We feel this document will further support the verification procedures listed above (**Attachment D**). As well, numerous reports are run from the TANF Data Report/File and reviewed by personnel for accuracy of the report. We have also attached a document created by Northrop Grumman, the contractor that is responsible for the ongoing facilities management of the TEAMS system, relating to the processing of the TANF Data File from their standpoint. (**Attachment E**).

The regulations indicate that a new data element to identify work-eligible individuals will be added to the TANF Data Report/File. We have taken steps to identify the work-eligible status for each individual who is included in the TANF cash assistance household, using their relationship to the children receiving TANF, whether or not they are an adult recipient or non-recipient, their participation code and family affiliation code. We anticipate a high level of accuracy for this data element.

4. *Describe the procedures that show how the State ensures that, for each work-eligible individual, it accurately inputs data into the automated data processing system, properly tracks the hours, and accurately reports countable hours to HHS that do not include participation in an activity that does not meet a Federal definition.*

In order to ensure that data is accurately being input into the automated data processing system (TEAMS), hours are properly tracked and only accurate, countable hours are reported to HHS, Montana utilizes the following procedures:

- System training regarding the correct coding of allowable work activities, adult/child indicators, participation codes and other system codes that are used in the identification of work participation status and type of family in the TANF Data File
- Policy guidelines and directives as to the accurate use of work activities and the verification/documentation of work activities
- TEAMS edits to ensure proper hours are entered regarding each work activity
- Case reviews completed by the eligibility worker's supervisors
- Ongoing training for eligibility staff provided by training specialists
- Training manual for the TANF program
- Policy manuals, instructions and bulletins
- Regional policy specialists who assist with policy questions
- TEAMS edits to ensure time-limited components are used correctly
- Case reviews conducted by WoRC Supervisors and WoRC monitors
- System reports identifying work activities, hours of participation and reconciliation practices
- System reports identifying use of specific work activities that must be approved by the WoRC Monitors prior to being used as an allowable work activity
- TEAMS reports of TANF File Data

Supervisory reviews include a monthly review of a limited selection of cases for each Eligibility Case Manager. These reviews will identify issues with the identifying data that was input into the eligibility system, including identification of work-eligible status and relationship to other household members.

Supervisory reviews are also conducted on the WoRC program. These reviews are completed monthly on a representative sample of TANF cases, defined as 3-5 case files for each WoRC Case Manager in larger counties; in areas with less than 10 cases, the entire caseload should be reviewed on a monthly basis.

These reviews are intended to identify issues with assessments, negotiation process of the Employability Plans for each work-eligible individual, accommodations if appropriate and use of the component codes, which identify the allowable work activities for each individual. As well the supervisors review the case file for verification of the actual hours completed within each allowable work activity, the presence of time sheets and other documentation, narratives, case monitoring and sanctions if appropriate.

These reviews are completed using the In-house Management Reviews completed by the supervisors of the WoRC Offices. The In-house Management Review Form is attached. **(Attachment F)**

Both of the supervisory reviews outlined above provide for internal control to prevent and correct data errors including coding errors, data omissions and other computational errors before they are reported in the TANF Data Report/File.

As stated previously and throughout the document, system edits are also in place that allow for limited use of component codes that identify limited work activities, e.g., Job Search and Vocational Education. This ensures that participation in an activity that exceeds the Federal limitation is not allowed and/or reported in the TANF Data Report/File.

Section 4

Internal Controls

1. *Describe the internal controls designed to ensure established work verification procedures are properly being employed.*

Montana currently utilizes a variety of internal controls designed to ensure established work verification procedures are properly being employed. As well, due to the strict requirements for verification and documentation outlined in the DRA, we plan to implement several new internal controls during FFY 2007.

Existing internal controls consist of the following:

- Monitoring and reviews of the WoRC Programs by the WoRC monitors
- Annual contract reviews of the WoRC Programs
- Policy guidelines and directives as to the accurate use of work activities and the verification/documentation of work activities
- Mandatory weekly contact with TANF participants by the WoRC Case Manager
- Staff training and conferences
- System reports identifying work activities, hours of participation and reconciliation practices. These reports include:
 - WoRC Active Case Listing which lists the caseload assigned to each WoRC Case Manager. This report is produced monthly.
 - Unreconciled Hours report which lists the TANF cases that have not had actual hours of participation input into the data system. This report is created twice a month and is a case management and reporting tool for the WoRC Case Managers.
- TEAMS edits
- Required use of the WoRC Monthly Report which tracks participation on a monthly basis and is used to provide feedback on the participation rate on a monthly basis
- In-house Management Reviews completed by the supervisors of the WoRC Offices. These reviews will be completed on a representative sample for each WoRC Case Manager for each month. The In-house Management Review Form is attached. **(Attachment F)**
- Additional system reports identifying use of specific work activities that must be approved by the WoRC Monitors prior to being used as an allowable work activity.
- Use of the National Directory of New Hire (NDNH) and Public Assistance Recipient Information System (PARIS) matching reports.
- Use of SOLQ and the SDX interface information to verify receipt of SSI and date of approval for SSI.

NOTE: At this time Montana has chosen to not exclude recipients of SSDI. If this option is chosen in the future, updates will be made to the Work Verification Plan.

In addition, the TEAMS system establishes internal controls via edits for time-limited work activities such as Vocational Educational Training and Job Search/Job Readiness. (Please refer to page 13 for information on the limitations in Job Search/Job Readiness and how Montana will verify our “needy state” status.)

TEAMS will also establish periodic reviews of disability status for individuals that are being cared for in the home by a TANF participant.

2. *Describe the internal controls to control for data errors, including transcription and coding errors, data omissions, computational errors, and compilation errors.*

The internal controls described in (1) above assist with data errors, coding errors and data omissions. For example, during the supervisory reviews of the TANF cases, the verification documentation is reviewed to ensure that the correct number of actual participation hours is being verified, recorded on the TEAMS system and therefore transmitted in the TANF Data Report/File. Signatures and timesheets are reviewed to ensure that the supervision is being provided as agreed upon and that the participant is aware of their responsibilities.

In conjunction with the internal controls previously described, TEAMS utilizes numerous edits and controls for data errors and coding errors including edits regarding minimum and maximum hours of participation, which limit the number of hours an individual is required to participate in work activities. TEAMS is designed to require specific information relating to the TANF Data File on the various TEAMS screens which are completed by the Eligibility Case Manager and the WoRC Case Manager, and utilizes error messages that will not allow authorization of TANF benefits if the required information is missing.

We would also refer to **Attachment E** which further supports the internal control information outlined above. This attachment outlines the system compilation of information in regards to the TANF Data File.

3. *Describe the checks used to isolate electronic systems and programming errors and the steps to ensure that all work participation report items are internally consistent.*

As previously described throughout this document, TEAMS utilizes various edits and controls for data errors and coding errors. In conjunction with the previously mentioned edits, TEAMS also employs edits regarding minimum and maximum hours of participation, which limit the number of hours an individual is required to participate in work activities. TEAMS is designed to require specific

information relating to the TANF Data File on the various TEAMS screens which are completed by the Eligibility Case Manager and the WoRC Case Manager, and utilizes error messages that will not allow authorization of TANF benefits if the information is missing.

We would also refer to **Attachment D** as well as **Attachment E** which further support the information above and outlines the system compilation of information in regards to the TANF Data File.

4. *Describe any sampling and estimation techniques employed in data validation.*

Montana does not utilize sampling or estimation techniques in data validation.

Section 5

Verification of Data used in Calculating Work Participation Rate

1. *For each of the data elements below, describe the State's data validation procedures to ensure "complete and accurate" data reporting.*
 - *Reporting Month*
 - *Stratum*
 - *Case Number*
 - *Disposition*
 - *Type of Family for Work Participation*
 - *Amount of Food Stamps Assistance*
 - *Receives Subsidized Child Care*
 - *Amounts of TANF and (SSP-MOE) Assistance*
 - *Family Affiliation Code*
 - *Non-custodial Parent Indicator*
 - *Date of Birth (Adult)*
 - *Relationship to Head-of-Household*
 - *Parent with Minor Child*
 - *Work-eligible Individual Indicator*
 - *Date of Birth (Child)*

Each of the above data elements are programmed into the automated eligibility and case management system, TEAMS and in the process reported in **Attachment D** and **Attachment E** which outline the process to compile the TANF Data Report/File.

Various system edits are in place which require information such as dates of birth for all household member, relationship to the head of the household, disabled indicators and also parental connection information which is all used to determine the type of family, whether or not an individual is a work-eligible individual, family affiliation and whether or not they are a parent of a minor child in the household.

Information regarding the amount of Food Stamp assistance is available within TEAMS as the system is also used to determine eligibility for the Food Stamp program. Information regarding the amount of child care assistance is retrieved from a "sister" eligibility system, Child Care Under the Big Sky or CCUBS.

When the system was developed and as enhancements are made to the system, a rigorous testing process is followed to ensure the requirements are met. As well, problems that are found on the system in regards to the above mentioned data elements are maintained in a problem reporting system and resolved as quickly as possible.

2. *Describe any procedures employed to eliminate data inconsistencies between two or more data elements.*

Within the process that compiles the TANF Data Report/File we have built in numerous cross checks that will identify inconsistencies between data elements. These inconsistencies, when identified, are brought to the attention of State Personnel who work with the eligibility case managers and computer programmers to identify the reason for the inconsistency and resolve the error. Please see **Attachment D** and **Attachment E** for more detail.

As well, numerous reports are created from the compilation of the TANF Data Report/File and reviewed by personnel to ensure the accuracy of the date being reported.

Work Participation Status

1. *Describe the State's procedures to ensure that a family is not disregarded from the work participation rate for more than 12 months per lifetime based on being a single custodial parent with a child less than one year of age.*

Montana has implemented a specific component code that is used on the Employability Plan of individuals who meet the criteria to be disregarded for this purpose. This component code is limited in use and system edits limit this component from being used for an individual in a household, which does not contain a child under the age of 12 months.

Montana is more restrictive than the federal policy on the use of this disregard as we have limited it to the month of birth, provided the child is added to the TANF household the month of birth and two full months following the birth of a child. We have maintained the 12 months in a lifetime limit as well using an edit process within the compilation of the TANF Data Report/File. This ensures that the information transmitted in the TANF Data Report/File on this element is accurate. Again, please refer to **Attachment D** as it further supports use of the specific component code and also outlines the specific edit process that is used during the compilation of the TANF Data Report/File which ensures the family is not disregarded from the work participation rate for more than 12 months per lifetime based on being a single custodial parent with a child less than one year of age.

2. *Describe the State's procedures to ensure that a family is not disregarded from the work participation rate for more than three months in any period of 12 consecutive months based on a work-eligible individual's refusal to participate in work.*

The TEAMS system uses disqualification reason codes, which identify the reason for an individual to be disqualified from receiving TANF cash

assistance. One disqualification reason code is specific to being sanctioned for refusing to participate in work. Numerous system edits allow this disqualification reason to be used only if a sanction exists for the individual.

We have maintained the three months in any period of 12 consecutive months limit by using the edit outlined above as well as an edit process within the compilation of the TANF Data Report/File. This ensures that the information transmitted in the TANF Data Report/File on this element is accurate. Again, please refer to **Attachment D** as it further supports the use of the specific disqualification reason codes, closure codes and also outlines the specific edit process that is used during the compilation of the TANF Data Report/File which ensures the family is not disregarded from the work participation rate for more than three months in any period of 12 consecutive months based on refusal to participate in work.

3. *Describe the State's procedures for ensuring a family deemed engaged in work based on 20 hours of participation in countable work activities meets the requirements of a single custodial parent or caretaker relative with a child under age six.*

Edits within the process that is used to compile the TANF Data Report/File ensure that if a family is deemed engaged in work based on 20 hours of participation in countable work activities that family meets the above definition. These edits specifically look to ensure that a child under the age of six is included in the household and the information stored on the Parent Connection/Relationship screen (PACR) ensure that the requirement of being a single custodial parent or caretaker relative is met. The use of specific component codes outlined above also ensure that the individual is involved in allowable work activities, as defined throughout Section 1 of this document.

Again, we would ask that you please refer to **Attachment D** as it further supports this information and process.

Section 6
Certification and Submittal Procedures

This is to certify that the Montana TANF Work Verification Plan dated September 26, 2008 includes all the information required by the Regulations at 45 CFR 261.62(b) and accurately reflects the provisions under which Montana will be operating effective October 1, 2008.

Certified by the TANF Administrator:

____Hank Hudson____
Hank Hudson, Administrator

____September 26, 2008____
Date

Montana is pleased to submit our revised Work Verification Plan to HHS.

The revised plan has been submitted on August 8, 2008 to:

Office of Family Assistance
Administration for Children and Families
5th Floor East
370 L'Enfant Promenade, SW
Washington, DC 20447

A copy of the revised plan has been submitted on August 8, 2008 to:

Vicky Herring
DHHS/ACF Regional Office
1964 Stout Street
Denver, CO 80294-3538